



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

July 16, 2010

Andrew M. Montañó
Environmental Project Manager
Bonneville Power Administration - KEC-4
905 NE 11th Avenue
Portland, Oregon 97208-3621

Re: Comments on the draft EIS for the Whistling Ridge Energy Project
EPA Project number 09-018-BPA

Dear Mr. Montañó:

The U.S. Environmental Protection Agency (EPA) has reviewed the Bonneville Power Administration (BPA) Draft Environmental Impact Statement (DEIS) for the proposed Whistling Ridge Energy Project (CEQ# 20100187) in Skamania County, Washington in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Clean Air Act (CAA) §309. Section 309 of the CAA directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

The DEIS analyzes potential environmental impacts of a proposal to interconnect a 75-megawatt (MW) Whistling Ridge Wind Energy project to the Federal Columbia River Transmission System (FCRTS). Because the project would be sited on private land, BPA will decide whether to grant the interconnection request for the project or not. For this decision to be made and the public to understand its implications, BPA developed and analyzed the Proposed and No Action alternatives to evaluate what environmental impacts, if any, would be associated with the proposed action. An authorization to interconnect the project to the FCRTS at a point along BPA's existing North Bonneville-Midway transmission line would require about 4 acres for construction of a substation and up to 1,000 feet long corridor where poles would be placed to support aboveground power lines.

EPA supports development of alternative and environmentally sustainable sources of energy such as wind power. The DEIS for this project includes a good analysis of anticipated environmental impacts from the project and identifies mitigation measures to offset the impacts and monitor effectiveness. Also, the DEIS states that Best Management Practices (BMPs) would be used to minimize any potential impacts. Because wind power technology and configuration of wind turbines in the project area are still relatively new, and their impacts on birds and bats within forested sites remain unclear; effective adaptive management will be important to reduce and mitigate the project impacts.

The DEIS indicates that water quality may be adversely affected if construction alters the hydrology of springs and surface runoff such that erosion carries sediment to nearby waterbodies. We recommend that this aspect of the project be monitored to assure that water quality is protected. Please also note that antidegradation provisions of the Clean Water Act apply to those waterbodies where water quality standards are currently being met, and prohibit degradation of their water quality. Thus, BPA should coordinate with Washington State Department of Ecology (Ecology) and Tribes affected by the project to assure that the state and tribal water quality standards would be met during implementation of the proposed action. Since the project anticipates obtaining a National Pollutant Discharge Elimination System (NPDES) permit for planned construction activities likely to disturb 1 or more acres, the final EIS should include updated information on such permit application process and conditions to protect water quality.

Based on our review, we have assigned a rating of LO (Lack of Objections) to the DEIS. This rating and a summary of our comments will be published in the Federal Register. A copy of the rating system used in conducting our review is enclosed for your reference.

Thank you for the opportunity to review this DEIS. If you have questions or comments concerning this review, please contact Theo Mbabaliye of my staff at (206) 553-6322 or me at (206) 553-1601.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.